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August 10, 2017

Martinez, et al. v. Deutsche Bank, et al.,
 17-cv-02474-NGG-RER

Dear Judge Garaufis:

Pursuant to the Court's July 28, 2017 Order, the parties respectfully submit this joint letter to propose a schedule and page limits for motion to dismiss briefing. The parties propose the following briefing schedule:

September 11	Motions to dismiss
October 10	Opposition
October 25	Reply

The parties also respectfully propose the following page limits for memoranda of law in support of motions to dismiss:

Defendants' Motions to Dismiss

- A joint motion to dismiss, submitted by Deutsche Bank AG; HSBC Bank USA, N.A.; Barclays Bank PLC; Standard Chartered Bank; The Royal Bank of Scotland N.V.; Commerzbank AG and Credit Suisse AG ("Moving Defendants"), not to exceed 35 pages, with each of these defendants also being permitted to submit an individual brief not to exceed 10 pages each.

Plaintiffs' Opposition

- Plaintiffs will have a total number of pages for their opposition briefing up to the total number of pages of all of the motion to dismiss memoranda submitted by the defendants. Upon reviewing the motions to dismiss, plaintiffs' counsel will assess the most efficient means of responding (i.e., either via one omnibus opposition memorandum or through separate briefs as to some or all of the motions to dismiss).

Defendants' Reply

- A joint reply brief, submitted by Moving Defendants, not to exceed 20 pages, with each of these defendants also being permitted to submit an individual reply brief not to exceed 8 pages each.

Defendants' Answer

- In the event the Court denies Moving Defendants' motions to dismiss in whole or in part, they will serve their Answers within 30 days of the Court's Order denying the motions.

Thank you for the Court's consideration.

Respectfully submitted,



John D. Buretta

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

VIA ECF

Copies to:

All counsel of record